

MATTHEW J. KLUGER  
ATTORNEY AT LAW

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## MEMO ENDORSED

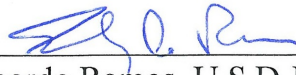
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October 8, 2020

By ECF  
Honorable Edgardo Ramos  
U.S. District Judge  
Southern District of New York  
40 Foley Square  
New York, N.Y. 10007

Motions are now due October 26, 2020. The response is due November 16, 2020.

SO ORDERED.

  
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Edgardo Ramos, U.S.D.J.  
Dated: 10/13/2020  
New York, New York

Re: **United States v. Angela Rodriguez**  
**20 Cr. 39 (ER)**

Dear Judge Ramos:

I represent defendant Angela Rodriguez in the above-referenced matter. With the consent of AUSA Samuel Rothschild, I write now to respectfully request that the motion schedule set by the Court on September 18, 2020 be modified as follows:

**Motions due: October 26, 2020**  
**Response: November 16, 2020**

Due primarily to a jury trial scheduled to begin on October 14, 2020 in the Southern District, and the difficulties preparing for same remotely, defense counsel has not had sufficient time to determine whether any motions are necessary in this matter.

I believe that time has already been excluded through the next conference scheduled for November 18, 2020 at 10:00 a.m., but if not, defense counsel has no objection to the exclusion of time for continued review of discovery, motion practice, and plea negotiations.

Thank you.

Respectfully,

/s/ Matthew J. Kluger  
Matthew J. Kluger, Esq.  
Attorney for Angela Rodriguez

cc: AUSA Samuel P. Rothschild